

July 14, 2022

VIA ECF

The Honorable Sarah L. Cave
United States District Court for the Southern District of New York
500 Pearl St.
New York, NY 10007

Catherine McKoy, et al. v. Trump Corp., et al., 1:18-cv-9936 (LGS-SLC)

Dear Judge Cave:

The parties submit this joint letter pursuant to the Court's July 1, 2022 Order, ECF No. 442, and further to the parties' June 30, 2022 joint update, ECF No. 441, concerning the status of the parties' compliance with the Court's May 18, 2022 Order, ECF No. 424.

With respect to document discovery, the parties incorporate their June 30 update, and add that the parties are continuing to meet and confer concerning the exhibits to the previously produced transcripts of depositions of Donald J. Trump in the Trump University litigation. Plaintiffs are reviewing the transcript and what they can glean from it about the withheld exhibits, and are working to propose a narrowed list of exhibits for Defendants' consideration. The parties expect to confer further on this issue in the coming week.

With respect to depositions, the parties are pleased to report that both sides continue to take party depositions as previously scheduled, and have now scheduled a number of non-party depositions as well, all of which are currently expected to take place within the deposition period ending August 31. The parties reserve all rights and will keep the court apprised in the event of scheduling issues, with non-parties in particular. Relatedly, in order to streamline the process of taking depositions in a timely manner, the parties have agreed to preemptively designate all depositions as confidential pursuant to the Protective Order, and to deem any portions of the deposition transcript discussing Confidential Discovery Material as having been designated Confidential by the party or non-party who designated the document being discussed. The parties intend to work collaboratively and promptly following the completion of depositions with respect to any revisions or objections concerning such designations.

Finally, Defendants have designated two individuals to testify on behalf of Defendant The Trump Organization, pursuant to Rule 30(b)(6). The parties are continuing to meet and confer concerning the scope of the Rule 30(b)(6) deposition and will bring any issues to the Court's attention as they arise.

The parties propose to provide a further update to the Court by July 25, 2022, setting forth any outstanding issues relating to the Court's May 18, 2022 Order or to the other issues set forth herein that the parties are unable to resolve.

Respectfully submitted,

/s/ John C. Quinn

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